REMARKS

Claims 1, 3-20, 22-39, 41-58 and 60-77 are pending in the application.

Claims 1, 3-20, 22-39, 41-58 and 60-77 have been rejected.

Claims 1, 11, 14, 20, 30, 33, 39, 49, 52, 58, 62, 65, 68, 71, and 74 have been amended. No new matter has been added. Support for these claim amendments can be found at least in p. 8, ll. 22-27, p. 9 ll. 1-37 and Figure 6 of the Specification.

Unless otherwise specified in the below discussion, Applicants have amended the above-referenced claims in order to provide clarity or to correct informalities in the claims. Applicants further submit that, unless discussed below, these amendments are not intended to narrow the scope of the claims. By these amendments, Applicants do not concede that the cited art is prior to any invention now or previously claimed. Applicants further reserve the right to pursue the original versions of the claims in the future, for example, in a continuing application.

Examiner Interview

Applicants would also like to thank Examiner Stork for the interview conducted on July 10, 2009. During the interview, possible amendments were discussed in an effort to advance prosecution. Applicants believe the amendments and discussions below to be in accord with the discussions presented during the interview.

Rejection of Claims under 35 U.S.C. § 103(a)

Claims 1, 11, 14, 20, 30, 33, 39, 49, 52, 58, 68 and 72 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2002/0054115

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naming Mack et al. as inventors ("Mack") in view of *Adobe® GoLive™ 5.0 User Guide*, Adobe, 2000 ("Adobe"), further in view of *Core Servlets and JavaServer Pages™*, Prentice Hall, 2000 ("Hall"), and further in view of U.S. Patent Publication No. 2004/0205616 listing Rosenberg et al. as inventors. Office Action, p. 4. Applicants respectfully traverse this rejection.

Claims 3-4, 12-13, 15-16, 22-23, 31-32, 34-35, 41-42, 50-51, 53-54, 60-61, 69-70, and 72-73 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mack, Adobe, Hall, and Rosenberg, and further in view of Ladd, *"Using HTML 4, XML, and Java 1.2,"* 1999, Que, Platinum Edition, Page 1004 ("Ladd"). Office Action, p. 7. Applicants respectfully traverse this rejection.

Claims 5, 24, 43, and 62 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mack, Adobe, Hall, and Rosenberg, and further in view of U.S. Patent No. 5,897,645 issued to Watters ("Watters"). Office Action, p. 8. Applicants respectfully traverse this rejection.

Claims 6-7, 25-26, 44-45, and 63-64 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mack, Adobe, Hall, Rosenberg, and Watters, and further in view Ladd. Office Action, p. 9. Applicants respectfully traverse this rejection.

Claims 8, 27, 46, and 65 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mack, Adobe, Hall, and Rosenberg, and further in view of U.S. Patent No. 6,289,506 issued to Kwong et al. ("Kwong"). Office Action, p. 9. Applicants respectfully traverse this rejection.

Claims 9-10, 28-29, 47-48 and 66-67 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mack, Adobe, Hall, Rosenberg and Kwong and further in view of Ladd.. Office Action, p. 10. Applicants respectfully traverse this rejection.

Claims 17, 36, 55 and 74 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mack, Adobe, Hall, Rosenberg and further in view of U.S. Patent Publication No. 2002/0075311 listing Orbanes et al. as inventors ("Orbanes"). Office Action p. 10. Applicants respectfully traverse this rejection.

Claims 18-19, 37-38, 56-57 and 75-76 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Mack, Adobe, Hall, Rosenberg and Orbanese and further in view of Ladd. Office Action, p. 11. Applicants respectfully traverse this rejection.

Claim 77 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Mack, Adobe, Hall, and Rosenberg and further in view of "XSL Transformations (XSLT) Version 1.0", November 16, 1999, w3c.org. ("XSL"). Office Action, p. 11. Applicants respectfully traverse this rejection.

In order for a claim to be rendered invalid under 35 U.S.C. §103, the subject matter of the claim as a whole would have to be obvious to a person of ordinary skill in the art at the time the invention was made. *See* 35 U.S.C. §103(a). This requires: (1) the reference(s) must teach or suggest all of the claim limitations; (2) there must be some teaching, suggestion or motivation to combine references either in the references themselves or in the knowledge of the art; and (3) there must be a reasonable expectation of success. *See* MPEP 2143; MPEP 2143.03; *In re Rouffet*, 149 F.3d 1350, 1355-56 (Fed. Cir. 1998).

The Office Action rejects independent Claims 1, 20, 39, and 58 using substantially the same reasoning. *See* Office Action, pp. 4-6. In light of this approach by the Office Action, and without conceding to the implication that these claims are indeed substantially the same, Applicants will address the rejections using Claim 1, as amended, as representative of the rejected claims. Claim 1, as amended, states:

> migrating a Cartesian coordinate-based view to a tag field-based view, wherein
>> the Cartesian coordinate-based view and the tag field-based view are user interfaces for presenting the same information, and
>> said migrating comprises
>>> selecting a tag field-based view, wherein
>>>> the selected tag field-based view comprises one or more applets, and
>>>> the selected tag field-based view is configured to serve as a model for converting the Cartesian coordinate-based view into the tag-field based view,
>>> identifying a first applet of the one or more applets, wherein
>>>> the first applet comprises one or more controls,
>>> associating the first applet with a tag field-based template for the first applet, wherein
>>>> the tag field-based template for the first applet comprises one or more characteristics of each of the one or more controls, and
>>>> the tag field-based template for the first applet is configured to serve as a model for converting a Cartesian view applet in the Cartesian coordinate-based view to a corresponding tag-field based applet,
>>> associating the tag field-based template for the first applet to a corresponding first Cartesian view applet in the Cartesian coordinate-based view, wherein
>>>> the first Cartesian view applet comprises a Cartesian view control,
>>> converting the Cartesian view control to produce a corresponding tag field-based view control, wherein
>>>> said converting matches the Cartesian view control with characteristics of the one or more controls in the tag field-based template for the first applet,
>>> mapping the corresponding tag field-based view control to the selected tag field-based view.

The Office Action relies on Mack, Adobe, Hall, and Rosenberg, in combination, to reject Claim 1. *See* Office Action, pp. 4-6. But Applicants respectfully submit that Mack, Adobe, Hall, and Rosenberg, alone or in combination, fail to show, teach or even suggest the limitations of Claim 1, as amended.

Applicants respectfully submit that the cited sections of Mack, Adobe, Hall, and Rosenberg fail to show, teach, or even suggest a method for migrating a Cartesian coordinate-based view into a tag field-based view. The cited sections of Mack disclose the use of Java applets for purportedly designing and creating stickers. *See* Mack ¶ [0019]. The Office Action relies on the teachings of Mack to disclose a migrating operation. *See* Office Action, p. 4. However, Applicants respectfully submit that the cited sections of Mack simply disclose a method for designing and creating images for a sticker, which is not equivalent to a migrating operation, much less migrating an existing Cartesian coordinate-based view into a tag field-based view. In fact, no migration operation is taught or suggested in Mack because the teachings of Mack provide for the creation of a new sticker. Therefore, the cited sections of Mack fail to show, teach, or even suggest a method for migrating a Cartesian coordinate-based view into a tag field-based view.

Likewise, the remaining references also fail to show, teach, or even suggest a method for migrating a Cartesian coordinate-based view into a tag field-based view nor are they cited for such a proposition. This is because the cited sections of Adobe simply disclose an HTML Source Editor tab for purportedly viewing and editing an HTML document. *See* Adobe, p. 306-307. The cited sections of Hall disclose a method for purportedly including HTML applets within a JSP Java plug-in. *See* Hall, p. 274-283. And, the cited sections of Rosenberg disclose a format conversion system. *See*

Rosenberg. ¶[0048]. Thus, each of the references fails to teach a method for migrating a Cartesian coordinate-based view into a tag field-based view.

Furthermore, the cited sections of Mack, Adobe, Hall, and Rosenberg fail to show, teach, or even suggest the claimed applet conversion operation for converting a Cartesian view applet in the Cartesian coordinate-based view to a corresponding tag-field based applet. Specifically, the references fail to show, teach, or even suggest a conversion operation for converting Cartesian view controls within a Cartesian view applet to produce corresponding tag field-based controls.

The cited sections of Mack disclose a set of Java servlets which purportedly take Java object based information from an applet and convert it into XML code. *See* Mack, ¶ [0020]. The cited sections of Adobe disclose the use of an HTML source editor tab for designing an HTML page, including the addition of buttons. *See* Adobe, p. 306-307. The Office Action equates Mack's servlets converting Java applets to XML and Adobe's teaching of including buttons with an HTML page with the claimed modifying a Cartesian view control to produce a corresponding tag view control. *See* Office Action, pp. 4-5. But the cited sections of Mack and Adobe fail to teach a conversion of Cartesian view applets into tag field-based applets. In addition, even if the functionality of Mack's Java servlets could be equated to an applet conversion (a point Applicants do not concede), Mack and Adobe still fail to show, teach, or even suggest how this Java servlet applet conversion provides a conversion of corresponding characteristics of controls within each applet. The cited sections of Mack provide for purported conversion of Java applets into XML but make no mention of controls within those applets, much less the conversion of such controls. The cited sections of Adobe disclose the use of an HTML editor to create a new HTML web page that may include buttons. Thus, Adobe provides

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no teaching or suggestion of a conversion operation specifically for converting controls within an applet. This is because Adobe's teachings are focused on the creation of a new HTML page and thus provide no need to convert Cartesian view controls into tag field-based controls. Therefore, the combination of Mack and Adobe fail to show, teach, or even suggest converting a Cartesian view control to produce a corresponding tag field-based view control, wherein said converting matches the Cartesian view control with characteristics of the one or more controls in the tag field-based template for the first applet.

Similarly, the remaining references also fail to show, teach, or even suggest the above limitations. This is because the cited sections of Hall and Rosenberg simply disclose a method for purportedly including HTML applets within a JSP Java plug-in and a format conversion system. *See* Hall, p. 274-283 & Rosenberg. ¶ [0048]. Therefore, both Hall and Rosenberg fail to show, teach, or even suggest the above limitations.
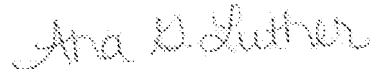
For at least these reasons, Applicants respectfully submit that Mack, Adobe, Hall, and Rosenberg, alone or in combination, disclose all the limitations of Claims 1, 20, 39, and 58, and all claims depending therefrom, and that these Claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5094.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

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